

## REMARKS

In response to the Office Action dated August 2, 2007, Applicants respectfully request reconsideration.

### 35 U.S.C. §103: Non-obviousness of the Claims

Regarding paragraph 4.1, claims 1, 3-4, 14 and 22-27 stand rejected under 35 U.S.C. §103(a), as being obvious in view of Oracle® Applications Concepts, Release 11 for UNIX, 1998 (“OraAPP”) and Oracle® Inventory Technical Reference Manual, Release 11i, December 1999 (“OraInv”). Claims 3 and 4 have been canceled without prejudice rendering the rejection moot. Applicants respectfully assert that claims 1, 14 and 22-27 are patentable over OraAPP and OraInv.

Applicants have herein amended each of the independent claims to specify that the list objects include at least one rule configured to logically remove an entity from a first list object and add the entity to a second list object based on the state or set of information associated with the entity. This characterization is consistent with the embodiment described in the specification:

“Lists 116, in accordance with one embodiment of the invention, are not simple static objects but instead can have rules associated with them. Rules can perform three basic actions: add an Entity 82 to one or more additional Lists 116, remove an Entity 82 from one or more Lists 116, or create Tasks 88.” (Spec., page 18, lines 1-5)

The asserted OraAPP and OraInv references, alone or in combination, do not teach, disclose, or suggest a computerized system for modeling a business process including a data architecture representing a business process including a plurality of list objects associated with at least one step in a transaction, each of the list objects comprising a list of at least one state or set of information that can be attained by or is associated with an entity involved in the transaction, wherein the state or set of information in the list is associated with the entity, and at least one rule configured to logically remove the entity from a first list object and add the entity to a second list object based on the state or set of information associated with the entity. The OraAPP and OraInv references disclose certain examples of database architectures within the Oracle APPS schema (OraAPP, 3-3). The APPS schema includes objects such as Tables, Views,

Procedures, Functions, and Triggers (Id.). The Examiner asserts that the internal concurrent manager processing is a list model to determine when a transaction request should be processed, and OraInv's INVTMTX is a concurrent program form to perform inventory miscellaneous transactions involving entities MTL\_MATERIAL TRANSACTIONS, MTL\_TRX\_SOURCE\_TYPES, and MTL\_TRANSACTION\_TYPES (8/2/07 Office Action, page 6).

Applicants respectfully disagree with the Examiner's conclusion, and assert that to the extent MTL\_MATERIAL TRANSACTIONS, MTL\_TRX\_SOURCE\_TYPES and MTL\_TRANSACTION\_TYPES can be described as "entities," neither the cited OraAPP nor the OraInv's references teach, disclose, or suggest a state or set of information in a list that is associated with the entity. Further, to the extent the OraAPP's internal concurrent manager processing can be considered a "list object," neither references discloses a rule configured to logically remove the entity from a first list object and add the entity to a second list object based on the state or set of information associated with the entity. For example, the OraInv reference describes that the MTL\_MATERIAL TRANSACTIONS is a table that stores a record of every material transaction or cost update performed in Inventory (OraInv, 3-377). The reference is silent regarding the state or set of information listed in the concurrent process manager (i.e., the list object) that is associated with the MTL\_MATERIAL TRANSACTIONS table (i.e., the entity). Further, the Applicants respectfully assert that Oracle APPS schema includes only one concurrent process manager (i.e., the only list object), and therefore it cannot support a rule configured to logically remove the MTL\_MATERIAL TRANSACTIONS table (i.e., entity) from a first list object and add the entity to a second list object based on the state or set of information associated with the entity. For at least these reasons, independent claims 1, 14, and 22, and claims 2, 5-13, 23-27, and 15-21 which depend directly and indirectly from claims 1 and 14 respectively, are patentable over the OraAPP and OraInv references.

Regarding paragraph 4.2, claims 2, 5-13 and 15-21 stand rejected under 35 U.S.C. 103(a) as being unpatentable over OraAPP in view of OraInv, and further in view of Oracle® Sales and Marketing Connected Client User's Guide, Release 11, March 1988 ("OraSAM"). Applicants respectfully assert that the OraSAM reference does not make up for the deficiencies of the OraAPP and OraInv references noted above with respect to independent claims 1 and 14. Thus,

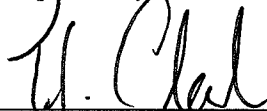
APPLICANTS: G. Earle *et al.*  
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claims 2, 5-13 and 15-21 which depend directly and indirectly from claim 1 and 14 are patentable over OraAPP, OraInv, and OraSAM.

### CONCLUSION

On the basis of the foregoing amendments, Applicants respectfully submit that the pending claims are in condition for allowance. If there are any questions regarding these amendments and remarks, the Examiner is encouraged to contact the undersigned at the telephone number provided below.

Respectfully submitted,



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T.J. Clark, Reg. No. 54,039  
Attorney for Applicants  
MINTZ, LEVIN, COHN, FERRIS,  
GLOVSKY and POPEO, P.C.  
Address all written correspondence to  
**Customer No. 30623**  
Tel: (617) 542-6000  
Fax: (617) 542-2241

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